



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

ELM
F. #2015R01787

*271 Cadman Plaza East
Brooklyn, New York 11201*

May 24, 2017

By Hand and ECF

Robert J. Cleary, Esq.
Dietrich L. Snell, Esq.
Proskauer Rose LLP
Eleven Times Square
New York, NY 10036

Re: United States v. Dan Zhong and Landong Wang
Criminal Docket No. 16-614 (DLI)

Dear Counsel:

Pursuant to Rule 16 of the Federal Rules of Criminal Procedure, the government hereby furnishes discovery with respect to the above-captioned matter. This disclosure supplements the government's earlier disclosure under cover of letters dated February 15, 2017 and May 22, 2017. The government renews its request for reciprocal discovery from the defendant.

Enclosed is a CD containing forensic images of electronic media seized pursuant to execution of a search warrant of the email account associated with the address "zhongdan515@msn.com." Please note that these materials may contain privileged attorney-client communications. The prosecution team has not reviewed these materials, and the filter team's review of these materials is ongoing.

If you have any questions or requests regarding further discovery or a disposition of this matter, please do not hesitate to contact me.

Very truly yours,

BRIDGET M. ROHDE
Acting United States Attorney

By: /s/ Elizabeth L. Macchiaverna
Elizabeth L. Macchiaverna
Assistant U.S. Attorney
(718) 254-6351

Enclosure

cc: Clerk of the Court (DLI) (by ECF) (without enclosure)